

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

YOLANY PADILLA, on behalf of herself and her 6-year-old son J.A.; IBIS GUZMAN, on behalf of herself and her 5-year-old son R.G.; BLANCA ORANTES, on behalf of herself and her 8-year-old son A.M.; BALTAZAR VASQUEZ, on behalf of himself;

Plaintiffs-Petitioners,

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (“ICE”); U.S. DEPARTMENT OF HOMELAND SECURITY (“DHS”); U.S. CUSTOMS AND BORDER PROTECTION (“CBP”); U.S. CITIZENSHIP AND IMMIGRATION SERVICES (“USCIS”); EXECUTIVE OFFICE FOR IMMIGRATION REVIEW (“EOIR”); THOMAS HOMAN, Acting Director of ICE; KIRSTJEN NIELSEN, Secretary of DHS; KEVIN K. McALEEANAN, Acting Commissioner of CBP; L. FRANCIS CISSNA, Director of USCIS; MARC J. MOORE, Seattle Field Office Director, ICE, JEFFERSON BEAUREGARD SESSIONS III, United States Attorney General; LOWELL CLARK, warden of the Northwest Detention Center in Tacoma, Washington; CHARLES INGRAM, warden of the Federal Detention Center in SeaTac, Washington; DAVID SHINN, warden of the Federal Correctional Institute in Victorville, California; JAMES JANECKA, warden of the Adelanto Detention Facility;

Defendants-Respondents.

JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING EXCHANGE OF
INITIAL DISCLOSURES AND
SUBMISSION OF 26(f)
REPORT- 1

Northwest Immigrant Rights Project
615 Second Ave., Ste. 400
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Telephone (206) 957-8611

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs and Defendants hereby stipulate and jointly move the Court for an Order extending the deadline for the exchange of initial disclosures and the filing of the Fed. R. Civ. P. 26(f) report.

On July 31, 2018, this Court entered an order setting the deadlines or the parties to meet and confer pursuant to Fed. R. Civ. P. 26(f), and to exchange initial disclosures and file a 26(f) report. ECF 17. The parties jointly determined that it was prudent to brief the issues in the motion to dismiss and motion for class certification prior to having a Rule 26(f) conference so that both parties had a fuller understanding of the issues. Pursuant to the instructions in that order, the parties jointly telephoned the Courtroom Deputy to request an extension. A thirty-day extension was granted. ECF 32.

The parties have met and conferred pursuant to this Court's order. However, after the conference, the parties agreed that additional time to discuss would be productive, and would lead to the submission of a 26(f) report that would be more useful to the Court. Accordingly, the parties jointly request an additional 30-day extension of the deadline to exchange initial disclosures and submit a Rule 26(f) report to the Court.

RESPECTFULLY SUBMITTED this 11th day of October, 2018.

s/ Matt Adams

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JOINT STIPULATION AND
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JOINT STIPULATION AND
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[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED. The parties shall exchange initial disclosures by November 5, 2018. The parties shall submit their 26(f) report by November 12, 2018.

DATED this ____ day of _____, 2018

THE HONORABLE MARSHA J. PECHMAN
UNITED STATES DISTRICT JUDGE

**JOINT STIPULATION AND
[PROPOSED] ORDER
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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2018, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

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**JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING EXCHANGE OF
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REPORT- 5**

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